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Attorneys for Defendant Tony Daniel Klein

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

VS.

TONY DANIEL KLEIN,

DEFENDANT.

No. 3:22-cr-00084-SI-1

**DEFENDANT'S SECOND AMENDED
PROPOSED WITNESS LIST**

Defendant hereby submits the following amended list of witnesses it may call to testify in the above-captioned matter, beginning July 10, 2023. The Defendant respectfully requests the opportunity to amend this list, both to add or subtract witnesses, as may be necessary throughout trial.

1 – DEFENDANT'S PROPOSED AMENDED WITNESS LIST

1. Andrea Sang (Nurse)
2. Jill Bird (Civilian, former AIC)
3. Tiffany Harrison (Civilian, AIC)
4. Celia Nash (Civilian, former AIC)
5. Teresa Gillette (Civilian, former AIC)
6. Nicole Navarre (Nurse)
7. Constantine Alleyne (Defense Expert Witness)
8. Sarah Rodgers (Civilian, former AIC)
9. Deborah Beaver, aka Deborah Reinhardt (Civilian, AIC)
10. Jennifer Cox, aka Jennifer Allen (Former, AIC)
11. Mark Olson (Nurse)
12. Gina Melise (Nurse)
13. Steve Wilson (Defense Investigator)
14. Brianna Robins (Defense Investigator)
15. Jace Hall (OSP)
16. Mark Dishion (ODOC)
17. Dawn Persels (OIG)
18. Andy Hasenkamp (OSP)
19. Melissa Follas (OSP)

Defendant also intends to call the following people as witnesses, who are also listed as Government Witnesses.

20. Caryn Ackerman, FBI

2 – DEFENDANT’S PROPOSED AMENDED WITNESS LIST

21. Wendy Armitage, CCCF Staff
22. Erik Becker, CCCF Staff
23. Elizabeth Bowditch, FBI
24. Dave Bowman, Investigator with Board of Nursing
25. Mike Brasch, CCCF Nursing Staff
26. Chad Drew, OSP
27. Erin Greiner Flindt, FBI
28. Teresa Hannon, CCCF Nursing Staff
29. Eric Hiser, FBI
30. Dane Koznek, CCCF Nursing Staff
31. Roslyn Lamb, CCCF Corrections Staff
32. Marie Merten, CCCF Corrections Staff
33. Lindsay Noack, CCCF Corrections Staff
34. Kristina Russo, former AIC at CCCF
35. Liz Sabin, CCCF Nursing Staff
36. Erick Sage, PREA coordinator ODOC
37. Marylou Ward, CCCF Correctional Staff
38. Erin Magee, FBI

Respectfully submitted on July 8, 2023

/s/ Matthew G. McHenry
Matthew G. McHenry
Counsel for Tony Klein

/s/ Amanda Alvarez Thibeault
Amanda Alvarez Thibeault
Counsel for Tony Klein

4 – DEFENDANT’S PROPOSED AMENDED WITNESS LIST